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HARMAN, L.K. HEALY, T.J.	
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April 27, 1995

95-RF-03787

Scott R. Grace Environmental Restoration Division DOE/REFO

PROPOSED ACTION MEMORANDUM AND LIQUID REMOVAL FROM TRENCH T-3 – PJL-024-95

Action: None required.

Pursuant to the your recent message regarding the Proposed Action Memorandum (PAM) and liquid removal from Trench T-3, EG&G Rocky Flats, Inc. would like to point out the following issues.

- 1) The expanded scope requested by the Environmental Protection Agency which would include pumping out all of the free liquids and address treatment and disposal of waste, will increase the cost substantially over the original estimate. Pumping out all of the liquids is not practicable or even possible. The liquids in the pore space and small void spaces will take considerable time to drain into the large void space that is intersected by the pump well. This recharging may be complicated by precipitation. This will require numerous pumping events, perhaps over several weeks or months. The pore space and small void space in the loose backfilled material may represent 30 percent or more of the volume of material.
- 2) The cost of waste treatment and/or disposal was not part of the original estimate. There is no known place to dispose of this rad/volatile organic analysis contaminated waste material. There is no present method of treating this waste on plant site.
- 3) There is no money available for this additional project scope. Furthermore, with the recent budget cuts, funding for treatability studies are being canceled. The bioremediation project will have to be cut unless the entire PAM is eliminated.
- 4) The Interim Measures/Interim Remedial Action (IM/IRA) will deal with this liquid material in a very effective and economical manner and will be performed at the same cost with or without the liquid. There will not be a cost savings by removing a portion of the liquid.
- 5) The Colorado Department of Public Health and Environment has deferred final review of this action until after review of the anticipated IM/IRA. Therefore, we are unable to respond to their review of the PAM document at this time.

EG&G Rocky Flats, Inc. will perform the work that the Department of Energy requests. However, the direction to proceed with this waste removal, in spite of the fact that an

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IM/IRA is in progress to deal with the entire trench, not just the liquid, seems unnecessary,

Peter J. Laurin Project Manager Operable Unit 2 Closure

PJL:bll

Orig. and 1 cc - S. R. Grace

cc: E. A. Dillé SAIC